

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION

CITY OF SOUTH BEND,)	
)	
Petitioner,)	
)	
vs.)	
)	
SOUTH BEND COMMON COUNCIL, TIM)	CASE NO. 3:12-CV-475-JVB-CAN
CORBETT, DAVE WELLS, STEVE RICHMOND,)	
BRIAN YOUNG, AND SANDY YOUNG.)	
)	
Respondents.)	

STIPULATION OF UNDISPUTED FACTS FOR TRIAL

The parties, the City of South Bend (the “City”), the South Bend Common Council (the “Council”), and Tim Corbett, Dave Wells, Steve Richmond, Brian Young, and Sandy Young (the “532 Plaintiffs”), by counsel, stipulate to the following undisputed facts for the purposes of trial:

1. The telephone conversations captured by the Police Department’s DIR recording system and subsequently reduced to five audio cassette tapes by Karen DePaepe occurred on the following dates:

- a. February 4, 2011
- b. April 5, 2011
- c. June 3, 2011
- d. June 6, 2011
- e. June 16, 2011
- f. June 27, 2011

g. July 14, 2011

h. July 15, 2011

Respectfully Submitted,

s/Edward A. Sullivan

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